

EXHIBIT 28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ACCESS LIVING OF METROPOLITAN
CHICAGO, INC., an Illinois non-profit
corporation,

Plaintiff,

V.

CITY OF CHICAGO, an Illinois municipal corporation,

Defendant.

Case No. 1:18-cv-03399
Honorable Edmond E. Chang

DECLARATION OF MICHAEL ALLEN

I, Michael Allen, hereby declare the following in support of Plaintiff's Local Rule

56.1(b)(3) Statement of Additional Material Facts:

1. I am over the age of eighteen and competent to testify with respect to the facts stated herein. I have personal knowledge of the facts below.
2. I consulted two pages on the website of the U.S. Department of Housing and Urban Development (“HUD”) to calculate the amount of Community Development Block Grant (“CDBG”) and HOME Investment Partnership Program (“HOME”) funds the City of Chicago received between 1993 and 2023: (a) Formula program allocations by grantee 2001-2023, *available at* https://www.hud.gov/program_offices/comm_planning/budget (last visited Nov. 16, 2023); and (2) Historical allocation data 1993-2003, *available at* <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Farchives.hud.gov%2Foffices%2Fcpd%2Fabout%2Fbudget%2Fhistorical04to93.xls&wdOrigin=BROWSELINK> (last visited Nov. 16, 2023).

3. Using the HUD records available at those locations, I copied down the amount of CDBG and HOME funds the City received each year from 1993 through 2023, and totaled those categories as follows:

FY	CDBG	HOME
1993	\$107,764,000	\$26,673,000
1994	\$118,943,000	\$26,180,000
1995	\$118,822,000	\$28,308,000
1996	\$115,658,000	\$29,337,000
1997	\$113,703,000	\$28,651,000
1998	\$109,438,000	\$30,349,000
1999	\$109,908,000	\$33,537,000
2000	\$110,103,000	\$33,622,000
2001	\$111,054,000	\$37,299,000
2002	\$109,283,453	\$37,327,000
2003	\$102,364,000	\$33,010,924
2004	\$100,852,000	\$33,067,734
2005	\$95,490,820	\$31,710,948
2006	\$85,858,436	\$29,893,144
2007	\$86,084,851	\$29,624,111
2008	\$82,723,276	\$28,779,956
2009	\$83,832,084	\$32,210,131
2010	\$90,582,706	\$32,135,117
2011	\$75,816,317	\$28,453,829
2012	\$71,873,523	\$17,226,156
2013	\$73,834,686	\$16,059,598
2014	\$72,815,019	\$16,651,363
2015	\$72,815,019	\$16,651,363
2016	\$72,220,468	\$15,455,951
2017	\$72,093,122	\$14,874,943
2018	\$78,904,033	\$20,803,171
2019	\$78,262,773	\$18,935,452
2020	\$79,503,555	\$20,123,948
2021	\$80,095,464	\$19,636,882
2022	\$76,233,776	\$21,593,700
2023	\$75,056,158	\$20,753,590
TOTAL	\$2,831,988,539	\$808,935,011

4. From these calculations, it appears that the City of Chicago received a total of Three Billion, Six Hundred and Forty Million, Nine Hundred and Twenty-Three Thousand, Five Hundred and Fifty Dollars (\$3,640,923,550) in CDBG and HOME funds from HUD between 1993 and 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in the United States on November 16, 2023.



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